

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TOMMY R. ORTIZ, an individual,

Plaintiff,

v.

WILLIAM EPPERSON, an individual,
THOMAS ZUBIK, an individual, RHAVEN
BARTEE, an individual, BRENDY LEE, an
individual, JANE DOE-MENTAL HEALTH
TECHNICIAN, an individual, SAMANTHA
MCDORMAN, an individual, NATHAN
BOYD, an individual, RALPH CARTER, an
individual, ALFREDA FLETCHER, an
individual, LADONALD SCOTT, an
individual, MICHELLE SANTOS, an
individual, JOHN DOE-SECURITY GUARD
1, an individual, and JOHN DOE-SECURITY
GUARD 2, an individual,

Defendants.

Case No. 18 CV 3385

Hon. Edmond E. Chang

**DHS DEFENDANTS' UNOPPOSED MOTION FOR
AN EXTENSION OF TIME TO SERVE INITIAL WRITTEN DISCOVERY REQUESTS**

Defendants William Epperson, Thomas Zubik, Samantha McDorman, Nathan Boyd, Ralph Carter, Alfreda Fletcher, LaDonald Scott, and Michelle Santos (collectively "DHS Defendants") by and through their attorney, Kwame Raoul, Attorney General of the State of Illinois, and pursuant to Federal Rule of Civil Procedure 6(b), respectfully requests that this Court extend the time for the parties to serve initial written discovery requests until June 24, 2021. In support of this unopposed motion, DHS Defendants state as follows:

1. The Court granted the parties until June 10, 2021 to serve initial written discovery.
2. Lead counsel for the DHS Defendants recently went on leave and undersigned counsel has been assigned to represent the DHS Defendants in her absence.

3. Undersigned counsel who was recently assigned to this case requires additional time to prepare and serve initial written discovery requests. Plaintiff's counsel also requires an additional week to serve initial written discovery

4. Accordingly, defense counsel requests an extension of time of two weeks, until June 24, 2021, for the parties to serve initial written discovery requests.

5. This motion is not filed in bad faith, for purposes of undue delay, or for any other improper purpose. This is the DHS Defendants' first request for an extension of time to serve initial written discovery requests.

6. The undersigned attorney contacted Plaintiff's counsel about this request for an extension of time, and Plaintiff's counsel does not object to this request.

Wherefore, the DHS Defendants respectfully request that this Court extend the time for the parties to serve initial written discovery requests to June 24, 2021.

Dated: June 9, 2021

Respectfully submitted,

KWAME RAOUL
Attorney General
State of Illinois

/s/ Hal Dworkin
HAL B. DWORKEIN
Assistant Attorney General
Office of the Illinois Attorney General
100 W. Randolph Street, 13th Floor
Chicago, Illinois 60601
(312) 814-5159
Hal.Dworkin@illinois.gov